

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE:

APPLICATION OF HORNBEAM CORP.

Case No.: 14-MC-424
(Part 1)

Judge Vernon S. Broderick

DECLARATION OF MICHAEL V. RELLA

Pursuant to 28 U.S.C. § 1746, I, Michael V. Rella, Esq., hereby declare:

1. I am a shareholder of Murphy & McGonigle, P.C. (the "Firm"), counsel in this action for Applicant Hornbeam Corporation ("Hornbeam"). I aver to the matters set forth herein based upon personal knowledge and information.

2. I submit this Declaration pursuant to the Court's Order, dated September 13, 2019 (Doc. 170) (the "Order"), and to address certain questions raised by the Court in the Order.

3. To the best of my knowledge, no person from the Firm has shared any Responsive Materials with any person or entity external to the Firm.¹

4. To the best of my knowledge, the following Certifications² issued pursuant to the February 1, 2016 protective order are currently in the Firm's files: [REDACTED]

¹ "Responsive Materials" refers to those materials defined in § 1(i) of the Second Amended Protective Order ("SAPO"). (See Doc. 106.)

² "Certification" refers to Certifications as they are defined throughout the SAPO. (See Doc. 106.)



5. Each of these Certifications was executed before the Firm appeared as counsel in this matter on Applicant's behalf, and therefore, the Firm did not provide the Certifications to the Court. To the best of my knowledge, I believe that one of Applicant's predecessor counsel (Holland & Knight) provided the Certifications to the Court in or around February 2016.

6. I had no knowledge of the existence of the communications described in Symeou's recent filings (*see, e.g.*, Doc. 156, 157) until I reviewed those filings.

7. I did not play any role – or offer to play any role – in providing Responsive Materials to any United States law enforcement entity or other, non-authorized party. To the best of my knowledge, the Firm did not provide Responsive Materials to any United States law enforcement entity or other, non-authorized party.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 20, 2019

A handwritten signature in black ink, appearing to read "Michael V. Rella", written over a horizontal line.

Michael V. Rella, Esq.